



MECKLENBURG COUNTY

Community Support Services

POLICY TITLE: Complaint Management	POLICY # CR-05
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Policy Statement:

Community Support Services (CSS) is committed to service quality and achieving a high level of client satisfaction. A key component of service quality is the timely, equitable resolution of complaints.

Definition:

A "complaint" is any verbal or written expression of dissatisfaction or discontent from a client or his or her representative on behalf of the client. When a concern is expressed by the client and addressed by staff, the client has the right to determine:

1. Their concern has been addressed and needs no further action, or
2. Their concern should be addressed formally.

An "informal complaint" occurs when a complaint is lodged, addressed informally with CSS staff, and the client deems satisfaction. This issue is considered resolved and no further action is required, other than noting the event in a progress note.

A "formal complaint" means a concern which the client determines the complaint has not been resolved informally, and which is then set out in writing, and addressed following the procedures below.

A "complaint investigation" includes any investigation by Division of Health Services Regulation (DHSR), Department of Social Services (DSS), Division of Mental Health/Developmental Disabilities/Substance Abuse Services (DMH/DD/SAS) or the Local Management Entity/Managed Care Organization (LME/MCO).

A complaint is "resolved" when the complainant accepts the verbal or written decision reached by CSS, withdraws the complaint, when no further action can be taken to assist the complainant, or the complainant can't be reached for follow-up. Once a formal complaint has been lodged, documentation on the complaint form is required.

The "Client Advocate" is the Substance Use Sr. Quality & Training Specialist identified to manage the SU complaint process as identified below.

Access to Information: Clients are informed of this policy during orientation and information on how to make a complaint is outlined in the Client Handbook which is also provided during orientation (Jail Program inmates are exempt).

Procedure:

1. Clients are made aware of their right to file a complaint regarding services at the time of admission, and how to initiate this process.

2. When a formal complaint is received by a staff member that includes but is not limited to a Supervisor, Program Administrator, Director or CSS Client Advocate, it is documented on Part A of the Client Input form by the client or designee.
3. The client advocate is notified of all formal complaints.
4. It is the goal of the CSS to have a resolution within ten (10) calendar days of the date of receipt of the complaint.
5. The following information is documented on the CSS Client Input Form:
 - a. Client's demographic information: telephone number, address, complainant name etc.
 - b. Reason for the complaint in client's words and what the client believes is necessary to resolve the complaint.
 - c. Permission to identify the client during the investigation, if given.
 - d. Provider/practitioner/organization information.
 - e. Actions taken by the recipient of the complaint as well as other staff that intervened.
 - f. Resolution and communication to the client.
 - g. Documentation when the client is not satisfied with the resolution of the complaint.
6. Complaints and concerns are categorized by a reason code as directed on the NC DMH/DD/SAS Customer Service Form, and are summarized below:

Complaint/Concern	Description
Abuse, Neglect, Exploitation	As defined in APSM 95-2
Access to Services	A client has been unable to obtain services or to obtain them within a reasonable timeframe.
Administrative Issues	Provider/facility-related concerns such as compliance with rules, paperwork, and customer service (not to include incident or safety concerns).
Authorization, Payment, or Billing Concerns	Any complaint related to utilization review, payment or financial arrangements, billing practices, or concerns related to the submission of Person-Centered Plans. Note: Concerns related to medical necessity will be logged and referred to the LME or the state-contracted utilization management provider, as appropriate.
Basic Needs	Any assistance to a client regarding food, shelter, medication assistance, etc.
Client Rights	Alleged client rights violations as referenced in NC General Statutes 122C and APSM 95-2.
Confidentiality/HIPAA	Any alleged breach of a client's confidentiality and/or HIPAA regulations.
LME/MCO Services	Any complaint regarding general administration, governance, business management, accounting, information management analysis and support, customer services, health call center, quality improvement initiatives, etc. specific to the LME/MCO.

Medication	Any complaint regarding the administration or prescribing of medication.
Provider Choice	Any complaint that a client or legal representative was not given information regarding available service providers.
Quality of Care	Any complaint related to client care regarding the following: <ul style="list-style-type: none"> ▪ inappropriate or inadequate provision of services, ▪ an incident or safety concern involving a provider or service site, ▪ service not meeting the needs of a client, ▪ treatment that is not consistent with acceptable practice, ▪ actions by professionals that may have led to injury, prolonged illness or disability, ▪ actions by professionals that may have decreased the likelihood of achieving desired health outcomes.
Service Coordination between Providers	Any complaint from one provider against another regarding: <ul style="list-style-type: none"> ▪ involvement in treatment and/or service planning. ▪ transfer of information needed for service provision, coordination, or discharge.
Other	All other complaints.

7. If the complaint cannot be resolved by the initial recipient, it is passed up the chain of command. If necessary, this may include a supervisor or a manager in another division.
8. The manager or supervisor receiving the complaint works to resolve the complaint within the identified time frame of 10 calendar days from the initial date of complaint.
9. If an unresolved complaint reaches the Substance Use Manager, this individual investigates and provides a written answer as to the disposition of the issue to the client. The written response includes a description of the process for appealing the decision.
10. If the complainant is dissatisfied with the resolution and wishes to appeal to the CSS Director, a request must be made in writing within 15 working days from the receipt of the decision letter.
11. The CSS Director will review the appeal and respond in writing within ten (10) calendar days from the date the appeal was received.
12. At any point in the process, the CSS Director or Designee may determine the need to follow up with the designated County Attorney regarding a complaint, incident, or corporate compliance issue.
13. At any point in the process, the complainant may choose to contact an advocacy agency for assistance. There is a list of these agencies, including the LME's Client Representative, in the CSS Client Rights Handbook.

14. CSS staff will take no action in retaliation toward the complainant and no barrier to services will be implemented.
15. Clients will receive the CSS Client Handbook at the time of admission and annually thereafter. Handbooks will be available upon request at all sites where clients are served.

Data Management:

Once the complaint is resolved, Client Representative will ensure that all required data elements are captured on the Client Input Form. Routine summary reports are provided to the CSS Performance Improvement Council (PIC) and the CSS Client Rights Committee at least quarterly. A yearly review of complaints will be conducted to track trends and identify areas needing improvement.

Performance Measures:

- 90% of all complaints will be resolved within 10 days or less.

References:

- Mecklenburg County Compliance Program – See MeckWeb for Current Information
- CARF Behavioral Health Standards Manual
- NC General Statutes 122C, Article III and APSM 95-2

Approved by:

CSS Performance Improvement Council


Community Support Services Director

Original Date: Prior to 1994 Reviewed/Revised Date: 2/22/16, 1/26/17 Effective Date: 2/26/17